

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
                            )  
                            ) CRIMINAL NO.: 04-10336-NMG  
v.                         )  
                            )  
JULIO SANTIAGO, et al.   )

**MOTION TO CONTINUE TRIAL TO OCTOBER 16, 2006**

The United States, through the undersigned attorney, respectfully requests that the Court set October 16, 2006, as the date for trial in the above-captioned matter.

As grounds for this motion, the government states that during the last court proceeding in this case on March 23, 2006, this Court set two dates for trial: (1) July 17, 2006, for trial and (2) October 16, 2006, as an alternate trial date. At the time of the March 23<sup>rd</sup> status hearing, the undersigned attorney, who is also designated a Special Assistant Attorney General, had a state case scheduled for trial on May 22, 2006, in Dedham Superior Court, which was marked "no further continuances." The case, Commonwealth v. Timothy White, No. 03-0154, is actually a re-trial involving a state trooper charged with the theft of over 25 pounds of cocaine from State Police custody and the domestic abuse of his wife. The initial trial, which resulted in a series of convictions and acquittals as well as a deadlocked jury on the most serious drug offenses, lasted more than 4 weeks. At a recent motion hearing on May 5, 2006, defense counsel requested a brief continuance of the trial date due to an unexpected family

emergency requiring his presence overseas. After an *ex parte* hearing at sidebar, the Superior Court granted the defendant's motion to continue, and set a new trial date of June 19, 2006.

Wherefore, given the length of the first trial in the White case, and because of the complexity of this twelve-defendant wiretap case and the time needed to prepare it adequately for trial, the undersigned attorney requests that trial in the above-captioned matter be set for October 16, 2006.<sup>1</sup>

Respectfully submitted,  
MICHAEL J. SULLIVAN  
United States Attorney

By: /s/William F. Bloomer  
WILLIAM F. BLOOMER  
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**CERTIFICATE OF SERVICE**-3644

I, William F. Bloomer, hereby certify that this document filed through the ECF system on May 16, 2006, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/William F. Bloomer  
WILLIAM F. BLOOMER

Date: 16 May 2006

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<sup>1</sup>The undersigned counsel is also involved in several active, ongoing investigations as well as several pending cases. For example, the undersigned prosecutor is assigned the case of United States v. Arlindo Dossantos et al., No. 01-10279-DPW, a complex CCE and historical marijuana conspiracy that has been scheduled for sentencing on June 29, 2006, and, if an evidentiary hearing is ordered, may require testimony from as many as a dozen witnesses.